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June 26, 1995

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OFFICE OF SECRETARY

FEDERAL COMMUNICATIONS COMMISSION

BY HAND DELIVERY

Mr. William F. Caton Acting Secretary Federal Communications Commission 1919 M Street, N.W., Room 222 Stop Code 1170 Washington, D.C. 20554

Re:

Reply Comments of IT&E Overseas, Inc.

IB Docket No. 95-41

In the Matter of Amendment to the Commission's Regulatory Policies Governing Domestic Fixed Satellites and Separate International Satellite

Systems

Dear Mr. Caton:

Enclosed for filing on behalf of IT&E Overseas, Inc. is a date-stamped copy of its reply comments in the above-referenced proceeding, which were filed with the Commission on June 23, 1995, and an amended certificate of service. Through inadvertence, copies of the reply comments were not served on the parties as indicated in the original certificate of service. Questions or correspondence with respect to this matter should be addressed to the undersigned.

Very truly yours,

Margaret L. Johny, P. C. Margaret L. Tobey, P.C.

Enclosure

cc(w/enc):

All parties of record

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Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

JUN 2 3 1995

In the Matter of)	FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY
)	
Amendment to the Commission's)	IB Docket No. 95-41
Regulatory Policies Governing)	
Domestic Fixed Satellites and)	
Separate International Satellite Systems)	

To: The Commission

REPLY COMMENTS OF IT&E OVERSEAS, INC.

IT&E Overseas, Inc. ("IT&E"), an international and domestic interexchange carrier operating under authority of the Federal Communications Commission ("FCC" or "Commission"), by its attorneys and pursuant to Section 1.415 of the Rules and Regulations of the FCC, 47 C.F.R. § 1.415, respectfully submits the following reply comments in response to the Commission's Notice of Proposed Rulemaking ("NPRM") in the above-captioned proceeding. In the NPRM, the Commission proposes to eliminate the distinction between its Transborder Policy and Separate International Satellite Systems Policy. Under the Commission's proposed approach, all U.S.-licensed geostationary fixed satellites would be treated under a single regulatory scheme.

IT&E, which is based in Guam, supports the FCC's proposal to permit all U.S.licensed satellites to provide both domestic and international services. Guam is a territory of
the United States which is considered domestic for telecommunications purposes.² Due to
Guam's distance and isolation, the island has been and continues to be inadequately served

Amendment to the Commission's Regulatory Policies Governing Domestic Fixed Satellites and Separate International Satellite Systems, Notice of Proposed Rulemaking, FCC 95-146 (released April 25, 1995).

² See IT&E Overseas, Inc. and PCI Communications, Inc., 7 FCC Rcd 4023 (1992).

by competitive satellite service providers. IT&E believes that eliminating the arbitrary distinction that currently exists between international and domestic satellite services will serve the public interest by stimulating the provision of satellite services to more remote United States locations, including the far western Pacific Ocean Region, where Guam is located. In addition, this action will increase competition between satellite service providers and terrestrial service providers in these same remote regions. The benefits of this increased competition, such as greater choice and lower prices, will ultimately benefit consumers.

Accordingly, IT&E supports the proposals set forth in the NPRM.

Respectfully submitted,

Margaret L. Tobey, P.C. Jennifer A. Manner, Esq.

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June 23, 1995

AMENDED CERTIFICATE OF SERVICE

I, Eileen O'Hara, an employee of Akin, Gump, Strauss, Hauer & Feld, L.L.P., certify that copies of the foregoing COMMENTS OF IT&E OVERSEAS, INC. were sent via First Class U.S. Mail, postage prepaid, or by Hand Delivery on this 26th day of June, 1995, to the following parties:

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*Commissioner Andrew C. Barrett Federal Communications Commission 1919 M Street, NW Room 826 Washington, DC 20554

*Commissioner Susan P. Ness Federal Communications Commission 1919 M Street, NW Room 832 Washington, DC 20554

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